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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

	x
	:
DOUGLAS KINSEY,	:
	:
Plaintiff,	:
	:
v.	:
	:
	:
CENDANT CORPORATION,	:
FAIRFIELD RESORTS INC., AND	:
FFD DEVELOPMENT COMPANY, L.L.C.,	:
	:
Defendants.	:
	x

Document Electronically Filed

Case No. 04 CV 00582 RWS

**NOTICE OF PLAINTIFF'S
 MOTION IN LIMINE**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Ira M. Saxe, and the Exhibits thereto, the accompanying Plaintiff's Motion in Limine to Exclude Evidence, the accompanying Compendium of Unreported Cases Cited in Plaintiff's Motion in Limine to Exclude Evidence, and all prior pleadings and proceedings herein, Plaintiff Douglas Kinsey ("Plaintiff") will move before the Hon. Robert Sweet, U.S.D.J., in Courtroom 18C of the United States Courthouse, 500 Pearl Street, New York, New York 10007, on November 12, 2008 at 12:00 noon, or as soon thereafter as counsel may be heard, for an order *in limine* pursuant to Rule 16(c)(3) of the Federal Rules of Civil Procedure granting the following relief:

(a) excluding the introduction of evidence at the trial of this action relating to Plaintiff's salary and other compensation at Bluegreen Corporation, where he was employed after the operative events of this lawsuit; and

(b) such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, shall be sent in accordance with the rules and orders of the Court.

Dated: October 20, 2008
New York, New York

Respectfully submitted,

CROWELL & MORING LLP

By: s/ Ira M. Saxe
Ira M. Saxe (IS 6051)

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Attorneys for Plaintiff Douglas Kinsey

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2008, I caused to be electronically filed the foregoing Notice of Plaintiff's Motion in Limine utilizing the Court's CM/ECF system, which will automatically send notice of such filing to the following attorneys of record, and served this document as well by first class mail delivery to the undersigned attorneys of record:

Samuel Kadet, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, NY 10036

s/ *Ira M. Saxe*
Ira M. Saxe